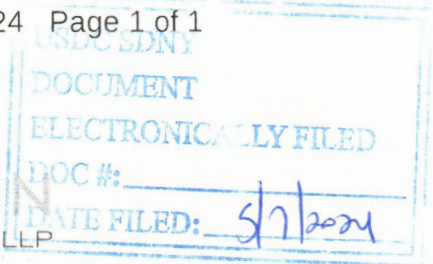


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May 1, 2024

Hon. Colleen McMahon, U.S.D.J.
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: McClam v. United States
23-cv-4292

Dear Judge McMahon,

This office represents the estate of Tony McClam. We are writing to notify the Court that the parties have made significant progress in settlement negotiations and believe they are very close to reaching an agreement. However, such settlement remains subject to the government approval process, which is estimated to take several weeks. 5/2/2024

Accordingly, the parties respectfully request that the discovery deadlines in this action be stayed by 30 days. The stay will enable the parties to conserve resources on discovery, including expert discovery, while we attempt to finalize an agreement. The parties propose notifying the Court, on or before, May 31, 2024, as to the status of the resolution of this matter.

Thank you for your continued consideration.

Respectfully,

/s/ Alexander Klein
Alexander Klein, Esq.